



Order Filed on September 1, 2015  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**JENKINS & CLAYMAN**

Eric J Clayman, Esquire  
412 White Horse Pike  
Audubon, New Jersey 08106  
(856) 546-9696  
Attorneys for the Debtor

In Re:

Robert Morris,  
debtor

Case No.: 14-33724 ABA

Adv. No.:

Hearing Date:

Judge: Altenburg

**CONSENT ORDER TO REDUCE THE PRE-PETITION BALANCE DUE TO STAPLE  
SEWING AIDS PENSION**

The relief set forth on the following page, number two (2) is hereby **ORDERED**.

**DATED: September 1, 2015**

  
\_\_\_\_\_  
Honorable Andrew B. Altenburg, Jr.  
United States Bankruptcy Court

This matter having been brought before the court upon the consent of Jenkins & Clayman, attorneys for the debtor and Howard D. Lipstein, Esquire, attorney for Staple Sewing Aids Pension, and for good cause having been shown, it is hereby:

**ORDERED** and **ADJUDGED** that:

1. Staple Sewing Aids Pension has filed a secured proof of claim for pre-petition arrears and interest which totals \$49,767.59. This creditor shall accept \$39,000.00 to be paid by the Chapter 13 Trustee as full satisfaction of this debt. The remaining balance due to this creditor shall be treated as a general unsecured claim.
2. Should the debtor complete his Chapter 13 plan and should Staple Sewing Aids Pension receive \$39,000 from the Chapter 13 Trustee, then the tax lien against debtor's residence shall be considered "paid in full" and "satisfied".
3. Should the debtor not complete his Chapter 13 plan, then the balance owed to Staple Sewing Aids Pension shall be determined in accordance with State law.

The undersigned hereby consent to the form and entry of this order:

Jenkins & Clayman  
Attorneys for debtor

Staple Sewing Aids Pension  
c/o Howard D. Lipstein, Esq

/s/ Eric J Clayman  
By: Eric J Clayman, Esq

/s/ Howard D. Lipstein  
By: Howard D. Lipstein, Esq.